

OFFICE OF
GENERAL COUNSEL

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Ms. Lisa J. Stevenson, Esquire
Acting General Counsel
Office of the General Counsel
Federal Election Commission
1050 First Street, NE
Washington, DC 20463

RE: MUR 7362

Dear Ms. Stevenson:

I am responding to the complaint that was made against my campaign by Don Bradway. His allegation that I have failed to report contributions received is entirely untrue, and he has failed to produce any evidence at all to back up his allegation. I have faithfully and carefully reported every campaign contribution to the FEC, and I have never been contacted by the FEC about any problems with my reports. The core of the complaint appears to be the fact that I have a very high percentage of small donations, and at a fundamental level Mr. Bradway does not seem to understand how FEC reports work. Every single campaign contribution has been properly reported, and the FEC has all of that information, but Mr. Bradway does not seem to grasp the fact that all of that data does not show up on the reports that he has been looking at.

Sadly, the motivation for this complaint appears to be quite personal. I am engaged in a very heated campaign for Congress in Idaho's first congressional district, and Don Bradway is very heavily involved in the campaign of one of my opponents named Russ Fulcher. In fact, Russ Fulcher even stays at Don Bradway's house when he visits north Idaho. We had pointed out that the FEC had raised some concerns with one of Russ Fulcher's FEC reports, and now Don Bradway appears to be retaliating.

In Bradway's complaint, he speculates that some of my donations "were in excess of contribution limits" or that "they were from prohibited contributors". But of course he has not provided any evidence whatsoever because he has none. Once again, he seems to fail to understand that information regarding every single contribution, no matter how small, has already been provided to the FEC. Anyone from the FEC can easily verify that Bradway's allegations are false by simply reviewing the information that I have previously submitted on my reports.

It is quite true that I have an unusually high percentage of small donors. Unlike several of my opponents, I do not have a network of wealthy donors to draw upon. Instead, my campaign has been largely financed by ordinary Americans that believe in what I am trying to do. Each and every one of those small donations has been faithfully reported, and the FEC already has all of that information. Bradway simply does not understand that every contribution, no matter how small, has already been fully documented and that you all already have the required information. In his desperation to dig up dirt on another campaign he is imagining some sort of conspiracy, but his allegations do not make any sense at all.

Bradway never claims that the total amounts raised on each report are in error. Instead, he is only concerned that the percentage of small donations on each report seems to be too high and that therefore something must be wrong. Of course he never provides one piece of hard evidence that actually proves that something was in error.

I know Don Bradway, and I am very well aware that he has a personal vendetta against me for running for Congress against his close friend. This is simply an attempt to harass and intimidate a hated political opponent, and it is quite frustrating that I have had to take time away from campaigning to respond to his completely baseless allegations.

Bradway would like the FEC to conduct a fishing expedition so that something can be found that would help Russ Fulcher's campaign. Bradway accuses me of "sloppy record-keeping", but once again he provides no evidence whatsoever to back up that claim. Every single financial contribution, both large and small, has been faithfully reported to the FEC. Bradway simply does not understand that the public reports that he has been viewing do not share all of the information on small contributors that has been reported to the FEC.

I have personally spent dozens of hours making sure that our FEC reports are accurate and complete. As a first-time candidate, I take pride in the fact that the FEC has not even requested any additional information for any of our reports yet. Our team is working exceedingly hard to always comply with federal law, and if the FEC ever has any concerns we will work as rapidly as we can to address them.

Don Bradway's complaint is filled with speculation, but he does not provide a single shred of solid evidence. He simply does not understand that every contribution, no matter how small, has already been reported to the FEC. Yes, we have a high percentage of small contributions, but the FEC already has all of the information for each one of those small contributions. If Bradway understood how FEC reports work, he would already know that.

Bradway has failed to establish that there is any evidence that a potential violation may have occurred, and so his complaint should be dismissed. I find it very troubling that he would seek to use this process as a political weapon, and I am quite certain that he would have never filed a complaint without the approval of his close friend.

It is quite easy for the FEC to verify that I have been providing the required information for all of my small contributors. Bradway's wild theories stem from the fact that he simply does not understand how FEC reports work. I wish that he had taken the time to get educated before firing off a baseless complaint.

Once again, Bradway never alleges that the total amount of contributions raised is wrong on any of the reports. Instead, he is simply speculating that there must be some violations among the contributions that are not itemized on the reports, and he is hoping to get the FEC to go on a fishing expedition.

Of course he doesn't understand that our campaign has already faithfully and completely reported all of those small contributions, and we have worked extremely hard to be as thorough as possible.

Bradway hopes that we are hiding something in the receipts that are not itemized on the reports. But he never produces one shred of evidence that this is the case, and anyone at the FEC can very quickly verify that this is not the case by looking at the information that we submitted for each contribution. Without these supposedly "hidden" violations that Bradway repeatedly speculates about, his whole complaint falls completely apart.

In order to have a legitimate complaint, Bradway needs evidence, and in this case he does not have any at all. He uses phrases such as "I believe" and "I am very concerned", but he never actually alleges anything that would constitute a violation of federal election law.

In the end, this entire complaint is the product of wishful thinking, and it was motivated by a desire to hurt someone that threatens to defeat his good friend in a very tightly contested race for an open seat in Congress.

Because this complaint is based on a fundamental misunderstanding of how FEC reports work, and because Don Bradway has failed to produce any real evidence that any sort of violation has taken place, I respectfully request that this complaint be dismissed.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Snyder". The signature is written in a cursive, flowing style.

Michael Snyder, Treasurer
Michael Snyder For Congress
P.O. Box 1136
Bonners Ferry, ID 83805